

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSEFINA PLOTNICK,	)	
MARIO VILLACORTA-SANTOS,	)	
ERIC SANTIAGO-VAZGUEZ,	)	
LORRAINE HAYFORD,	)	No. 13 C 2454
ANNA CALLIS,	)	
LEEANN JOHNSON, and	)	
SANDRA NOEY-KRAKKER,	)	Judge Robert M. Dow
	)	Magistrate Judge Young B. Kim
Plaintiffs,	)	
	)	
v.	)	
	)	
MIDLAND FUNDING, LLC, a Delaware	)	
limited liability company, and MIDLAND	)	
CREDIT MANAGEMENT, INC.,	)	
a Kansas corporation,	)	
	)	
Defendants.	)	

**JOINT MOTION TO EXTEND DISCOVERY AND DISPOSITIVE MOTION  
DEADLINE**

Plaintiffs and Defendants (collectively “Parties”), respectfully move the Court to extend the discovery deadline by 45 days to May 15, 2014 and the dispositive motion deadline by 30 days to June 16, 2014. In support of this motion, the Parties state as follows:

1. This lawsuit was previously several separate lawsuits that were consolidated on August 20, 2013. DE 31-32.
2. On October 9, 2013, the Court set a deadline of March 31, 2014 for discovery cut-off. DE 35.
3. This lawsuit involves 7 plaintiffs who reside in California, Washington, Massachusetts, Florida, Pennsylvania, and Michigan, and 2 defendants located in California. Defendants also require the depositions of several third parties.

4. Counsel for the parties have attempted to schedule all the depositions before the end of the discovery deadline, however, due to the extensive amount of travel required to take all the depositions, counsel for the parties are still in the process of scheduling the depositions and need additional time to do so. In the meantime, the parties continue to discuss a possible settlement of the case.

5. Accordingly, the parties jointly request an additional 45 days to conduct the depositions in this matter.

6. Neither party will be prejudiced by this extension.

7. No trial date has been set. The dispositive motion deadline of May 15, 2014 will need to be rescheduled, and the parties suggest June 16, 2014 for a new dispositive motion deadline.

WHEREFORE, Plaintiffs and Defendants Midland Funding, LLC and Midland Credit Management, Inc. respectfully request that the Court extend the discovery deadline by 45 days to May 15, 2014, resetting the dispositive motion deadline to June 16, 2014, and for any other relief this Court deems just.

Dated: March 14, 2014

By: **PLAINTIFFS JOSEFINA PLOTNICK,  
MARIO VILLACORTA-SANTOS, ERIC  
SANTIAGO-VAZGUEZ, LORRAINE  
HAYFORD, ANNA CALLIS, LEEANN  
JOHNSON, and SANDRA NOEY-KRAKKER**

/s/ David J. Philipps

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Dated: March 14, 2014

**MIDLAND CREDIT MANAGEMENT, INC.  
and MIDLAND FUNDING, LLC**

s/Amy R. Jonker

By: Theodore W. Seitz (tseitz@dykema.com)

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